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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR STATEMENT RE:  
INTENT TO USE LYFT INFORMATION  
AT TRIAL**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Uber Technologies, Inc. and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Statement Re: Intent to Use Lyft  
8 Information at Trial (the “Administrative Motion”). The Administrative Motion seeks an order  
9 sealing highlighted portions of Defendants’ Statement Re: Intent to Use Lyft Information at Trial  
10 (“Uber’s Statement”) and the entirety of Exhibits 1, 3, and 4 thereto.

11 3. The portions of Uber’s Statement and Exhibit 1 highlighted in green, and the entirety of  
12 Exhibits 3-4 contain or refer to confidential business information, which Waymo seeks to seal.

13 4. Uber’s Statement (portions highlighted in green), Exhibit 1 (portions highlighted in  
14 green in version filed herewith), and Exhibits 3-4 (entire documents) contain, reference, and/or  
15 describe Waymo’s highly confidential and sensitive business information. The information Waymo  
16 seeks to seal regards confidential analysis of Waymo’s business and competition, including strategy  
17 and partnerships. I understand that this confidential business information is maintained by Waymo as  
18 secret. The public disclosure of this information would give Waymo’s competitors access to in-depth  
19 insight into—and analysis of—Waymo’s business strategy for its autonomous vehicle system. If such  
20 information were made public, I understand that Waymo’s competitive standing would be  
21 significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Statement and  
23 Exhibits 1 and 3-4 that merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on October 27, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC  
7

8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
10 document has been obtained from Felipe Corredor.  
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12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven  
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